



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TX 75202-2733

March 4, 2011

Lisa Mizuno
Gila National Forest
3005 E. Camino del Bosque
Silver City, NM 88061

Dear Ms. Mizuno:

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Environmental Impact Statement (DEIS) prepared by the Gila National Forest (Forest) for Travel Management on the Gila National Forest. The Forest proposes to make changes to the current system of National Forest System roads, motorized trails, and areas and amend the "Gila National Forest Plan" to prohibit motor vehicle travel off the designated system.

Based on our analysis, EPA rates the DEIS as "LO" (Lack of Objections). However, EPA offers suggested recommendations and minor comments for preparation of the Final EIS (FEIS). EPA's comments are intended to strengthen the NEPA document and are as follows:

Alternatives, including the Proposed Action

40 CFR §1502.14 states that the Alternatives section "provides a clear basis for choice among options". EPA believes this basis is not clearly defined in the DEIS. Please formulate the basis for comparison and include an alternatives screening analysis, including a comparison of alternatives and reasons why alternatives were eliminated or carried forward. The FEIS should include clear and concise rationale as to why **Alternative G** was chosen as the preferred alternative.

Air Quality

Any demolition, construction, rehabilitation, repair, dredging, or filling activities have the potential to emit air pollutants. EPA recommends best management practices be implemented to minimize the impact of any air pollutants. All construction and waste disposal activities should be conducted in accordance with applicable local, state and Federal air quality statutes and regulations.

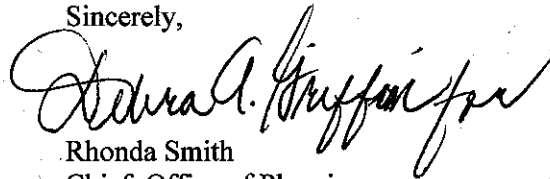
Environmental Justice

A potentially adverse impact could result on a vulnerable community from the decrease (by less than 24%) in miles of roads and trails with regard to firewood gathering. More than half of the households in Catron County rely on firewood as the main energy source for heating/cooking. The Forest Service, however, is planning designated areas near the communities for personal firewood gathering. This should enable these residents to continue their firewood-gathering practices, along with other Forest activities, with no real impediments.

Although the ten Federally recognized Tribes that were consulted/contacted in the development of this DEIS may have social interests in the Forest, and have historical/traditional ties to this land, these Tribes do not have treaty rights on the Forest. Because of the significant distance of the Forest to Tribal lands and reservations, longer drives are required to access the Forest than are required of those who live nearby. Tribal members are not economically tied to the Forest, but they occasionally participate in activities there for personal, traditional, community, group, or religious reasons. Gathering of forest products such as piñon nuts, Emory oaks, and firewood are activities identified as practices Indian visitors engage in and they will not have to pay for a permit for gathering forest products, as will other people. For these reasons, the selected plan should not significantly impact any of these Tribal activities.

EPA appreciates the opportunity to review the DEIS. Please send our office two copies of the FEIS when it is sent to the Office of Federal Activities, EPA (Mail Code 2252A), Ariel Rios Federal Building, 1200 Pennsylvania Ave, N.W., Washington, D.C., 20004. Our classification will be published on the EPA website, www.epa.gov, according to our responsibility under Section 309 of the CAA to inform the public of our views on the proposed Federal action. If you have any questions or concerns, please contact Michael Jansky of my staff at jansky.michael@epa.gov or 214-665-7451 for assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Rhonda A. Griffin" with a stylized flourish at the end.

Rhonda Smith
Chief, Office of Planning
and Coordination